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August 7, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Bridging the Digital Divide for Low Income-Consumers, WC Docket No. 17-287;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No.
09-197; Connect America Fund, WC Docket No. 10-90

Notice of Ex Parte Communication

Dear Ms. Dortch:

On August 5, 2019, a representative of TracFone Wireless, Inc. met by telephone with a Commission staff member, Nicholas Degani, Senior Counsel to Chairman Pai. Mr. Degani and Mr. Why discussed (1) the National Verifier, (2) Minimum Service Standards for the Lifeline Program, and (3) TracFone's Tribal Petition. Summaries of their communications on each topic follows.

1. National Verifier

Regarding the National Verifier, Mr. Why reiterated to Mr. Degani the importance of incorporating into the launch of the National Verifier Application Programming Interfaces (APIs) to allow two-way communication between the National Verifier and entities such as Lifeline providers. Further, Mr. Why continued to emphasize the critical need for the National Verifier to incorporate connections to state databases, such as SNAP and Medicaid databases, to automatically verify Lifeline eligibility for low-income consumers.

2. Lifeline Program Minimum Service Standards

Turning to Lifeline Program Minimum Service Standards, Mr. Degani and Mr. Why discussed the "Joint Petition to Pause Implementation of December 2019 Lifeline Minimum

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Service Standards Pending Forthcoming Marketplace Study,”¹ filed by CTIA, National Hispanic Media Coalition, National Consumer Law Center, OCA-Asian Pacific American Advocates, and United Church of Christ, OC Inc. with the Commission on June 27, 2019. Mr. Why expressed TracFone’s support for the Joint Petition and TracFone’s serious concerns with the implementation of new minimum service standards anticipated in December 2019.

3. Tribal Petition

Finally, Mr. Degani and Mr. Why discussed “TracFone Wireless, Inc.’s Second Amendment to Petition to Expand Eligible Telecommunications Carrier Designation to Include Tribal Lands and Motion for Expedited Action”² filed by TracFone with the Commission on February 28, 2019. Mr. Why explained to Mr. Degani that TracFone initially filed its Petition on September 11, 2017, amended it on September 18, 2017, and further amended the Petition on February 28, 2019.

If the Commission approves TracFone’s Petition, the Commission would significantly enhance competition in the Tribal Lands located in Alabama, Connecticut, New York, North Carolina, and Virginia, locations where TracFone has already been designated as an Eligible Telecommunications Carrier. Mr. Why emphasized that it is important to the public interest to improve competition on these Tribal Lands because for example, in Alabama, North American Local LLC, a wireless provider, receives over 75% of the Tribal Lands support in that state. North American Local LLC offers a Lifeline plan for free that includes 1,000 voice minutes, unlimited text messaging, and 11 megabytes of data. In contrast, TracFone proposes to offer Tribal residents a much more generous plan of unlimited voice minutes, unlimited text messaging, and 4 gigabytes of data for free.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is filed in ECFS. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Geoffrey G. Why
Geoffrey G. Why

CC: Nicholas Degani, Senior Counsel, Chairman Ajit Pai

¹ The Petition may be found at:

<https://ecfsapi.fcc.gov/file/106270798206687/190627%20Joint%20Petition%20re%20Lifeline%20MSS.pdf>

² The Second Amendment to the Petition may be found at:

<https://ecfsapi.fcc.gov/file/10228830200523/TracFone%20-%20Second%20Amendment%20to%20Petition%20to%20Expand%20ETC%20to%20Tribal%20Lands%20sent%202-28-19.pdf>